

**UNITED STATE DISTRICT COURT
FOR THE SOUTHERN
DISTRICT OF TEXAS**

**IN THE COURT DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS**

United States Courts
Southern District of Texas
FILED

APR 21 2021

Nathan Ochsen, Clerk of Court

DISH NETWORK L.L.C.,

Plaintiff,

vs.
**DINESH VUGNESWARAN et al., d/b/a/
Chitram TV**

Defendant

Civil Action No: **4:21-cv-859**

**STATEMENT OF
JOE THOMAS**

I, Joe Thomas, hereby attest that the following statements are true under penalty of perjury.

1. I make the following statements based upon my own personal knowledge and in support of "Defendants' filed civil action no: 4:21-CV-859 concurrently herewith.
2. I am not selling Chitram TV set-top box receivers and streaming service. The fact of the matter is that I met a person named Benny Sabastian at Catholic Church named as guardian angel RC church in brooklyn, NY, in August 2017.
3. On the above-mentioned date, at an above-mentioned Church, I was seated next to him at the said occasion; while having formal introduction with Benny Sabastian we had general discussion about religion, later on he stated that I use to watch all catholic and religious channels through the platform mentioned in your letter. I am a religious person since my childhood, the said platform attract my attention, so do I ask him to provide their contact details, further he provided their support number +1-585-326-6085.
4. When I contacted their support line and have requested a box; they have asked for my details and I provided them. After my order was enclosed they further said that the person who will deliver your order at your mention address named Arav Sai.
5. The said order I received was very user-friendly and I was very convenient with their service of providing quality religious channels. Later on, I recommend the said product to a couple of my friends and family members and also helped them towards the placement of their orders to Arav

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Sai through provided contact number +1-585-326-6085, and he delivered their boxes at my location.

6. It is pertinent to mention here that Arav Sai asked me to help them to resell their said product and offered me 10 USD as a profit margin for the recommendation. As I mention above I am a religiously oriented person, I categorically refused his offer but I further stated that besides accepting your pecuniary offer I shall made a favor by recommending the said product to all my friends and family members.

7. A few weeks later, I received several unknown calls and they were requesting about the said product. I help a few of them by thinking they might be my friends and family recommendations. Later I asked one of them how did you get my contact details; he replied by saying that we found it from the said product website. I called their support line and said about my grievances to them and found that they have shared my personal information on their website, that's the reason why unknown persons calling at my number and asking about the product. It is pertinent to mention here that I categorically order them to take down my personal information from their website and also threaten them with legal consequences if they failed to do so.

8. About the above mentioned facts, it is hereby stated that I am just an end-user of the said product and have no concern with the selling, reselling, selling subscription codes, devices and equipment for the said product, hence your allegation are absolutely baseless.

It is humbly prayed to the honorable court that please removes my name from all types of investigation and further litigations.

I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND USE AS EVIDENCE IN COURT AND IN SUBJECT TO PENALTY FOR PERJURY.

Dated on the 19th of April, year 2021



Joe Thomas